

GEORGE M. RANALLI, ESQ.
Nevada Bar No. 5748
JASON ANDREW FOWLER, ESQ.
Nevada Bar No. 8071
RANALLI ZANIEL FOWLER & MORAN, LLC
2340 W. Horizon Ridge Parkway, Suite 100
Henderson, Nevada 89052
Telephone: (702) 477-7774
Facsimile: (702) 477-7778
ranalliservice@ranallilawyers.com
Attorney for Defendant,
WALGREEN CO.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

SARAH CASTILLO AGURCIA,)	
)	
Plaintiff,)	CASE NO.: 2:25-cv-00146-MMD-MDC
)	
vs.)	
)	
WALGREEN CO., a Foreign Corporation)	
d/b/a Walgreens #5311, DOES I through X;)	
and ROE CORPORATIONS I through X,)	
inclusive,)	
)	
Defendants.)	
)	

ORDER GRANTING STIPULATION TO REMAND CASE TO STATE COURT

IT IS HEREBY STIPULATED AND AGREED, by Plaintiff, SARAH CASTILLO AGURCIA, and Defendant, WALGREEN CO., by and through their undersigned counsel that Plaintiff's claims in this action be remanded to the Clark County District Court of Nevada, Case No.: A-24-907172-C , as the Plaintiff concedes that the matter in controversy does not exceed \$75,000, exclusive of interest and costs, pursuant to 28 U.S.C. § 1332, and parties hereby

. . .

. . .

stipulate that award in this matter shall not exceed the sum of \$75,000, exclusive of interest and costs, pursuant to 28 U.S.C. § 1332, and, thus, this Court lacks jurisdiction of this matter.

<p>Dated: February 25, 2025</p> <p>MOSS BERG INJURY LAWYERS</p> <p>/s/ Marcus A. Berg</p> <p>MARCUS A. BERG, ESQ. Nevada Bar No. 9760 JOHN C. FUNK, ESQ. Nevada Bar No. 12980 Attorneys for Plaintiff</p>	<p>Dated: February 25, 2025</p> <p>RANALLI ZANIEL FOWLER & MORAN, LLC</p> <p>/s/ <i>Jason Andrew Fowler, Esq.</i></p> <p>GEORGE M. RANALLI, ESQ. Nevada Bar No. 5748 JASON ANDREW FOWLER, ESQ. Nevada Bar No. 8071 Attorneys for Defendant, WALGREEN CO.</p>
---	--

ORDER

BASED UPON THE STIPULATION OF THE PARTIES and good cause appearing therefore,

IT IS HEREBY ORDERED ADJUDGED AND DECREED that:

- This Court lacks jurisdiction of this matter as Plaintiff stipulates that the matter in controversy does not exceed the sum of \$75,000, exclusive of interest and costs, pursuant to 28 U.S.C. § 1332; and

. . .
. . .
. . .
. . .
. . .
. . .

2. Plaintiff's claims in this action are remanded to the Clark County District Court of Nevada, Case No.: 24-907172-C .

DATED this 26th day of February, 2025.


U.S. DISTRICT COURT JUDGE

Respectfully submitted by:
RANALLI ZANIEL FOWLER & MORAN, LLC

/s/ Jason Andrew Fowler, Esq.

GEORGE M. RANALLI, ESQ.

Nevada Bar No. 5748

JASON ANDREW FOWLER, ESQ.

Nevada Bar No. 8071

RANALLI ZANIEL FOWLER & MORAN, LLC

2340 W. Horizon Ridge Parkway, #100

Henderson, Nevada 89052

Attorneys for Defendant,

WALGREEN CO.

RANALLI ZANIEL FOWLER & MORAN, LLC
2340 W. HORIZON RIDGE PARKWAY, SUITE 100
HENDERSON, NEVADA 89052
TELEPHONE: (702) 477-7774 FAX: (702) 477-7778



RE: Activity in Case 2:25-cv-00146-MMD-MDC Castillo Agurcia v. Walgreen Co. Minute Order Removal Case

From Tonya Baltazar <Tonya@mossberglv.com>

Date Wed 2/19/2025 9:04 AM

To Jason Fowler <jfowler@ranallilawyers.com>; Vicki Perez <vperez@ranallilawyers.com>; Celeste Palafox <cpalafox@ranallilawyers.com>; Mikayla Fritchley <mfritchley@ranallilawyers.com>

Cc Marcus Berg <Marcus@mossberglv.com>; John Funk <John@mossberglv.com>

Yes you can e-sign for Marcus

Have a Great Day! 😊

Tonya Baltazar, Paralegal
MOSS BERG INJURY LAWYERS
5420 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89146
Telephone: (702) 222-4555
Facsimile: (702) 222-4556
tonya@mossberglv.com
www.mossberginjurylaw.com



CONFIDENTIALITY NOTICE: The information contained in this e-mail message is attorney privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. Nothing in this e-mail should be construed as an electronic signature or an act constituting a binding contract. If you have received this communication in error, please immediately notify us at (702) 222-4555. Thank you.

From: Jason Fowler <jfowler@ranallilawyers.com>

Sent: Tuesday, February 18, 2025 1:31 PM

To: Tonya Baltazar <Tonya@mossberglv.com>; Vicki Perez <vperez@ranallilawyers.com>; Celeste Palafox <cpalafox@ranallilawyers.com>; Mikayla Fritchley <mfritchley@ranallilawyers.com>

Cc: Marcus Berg <Marcus@mossberglv.com>; John Funk <John@mossberglv.com>

Subject: RE: Activity in Case 2:25-cv-00146-MMD-MDC Castillo Agurcia v. Walgreen Co. Minute Order Removal Case

Here is the proposed stipulation, please advise if we may affix Marcus or John's electronic signature.
Thank you.

Jason

Jason Andrew Fowler, Esq.
Managing Partner
Ranalli Zaniel Fowler & Moran, LLC
2340 W. Horizon Ridge Pkwy. # 100
Henderson, Nevada 89052
702.477.7774 - Phone
702.477.7778 - Fax



RANALLI ZANIEL
FOWLER & MORAN, LLC
TRIAL ATTORNEYS

Las Vegas - Reno - Phoenix

NOTICE: The above information is for the sole use of the intended recipient and contains information belonging to Ranalli Zaniel Fowler & Moran, LLC which is confidential and may be legally privileged. If you are not the intended recipient, or believe that you have received this communication in error, you are hereby notified that any printing, copying, distribution, use or taking of any action in reliance on the contents of this e-mail information is strictly prohibited. If you have received this e-mail in error, please immediately (1) notify the sender by reply e-mail; (2) call our office at (702) 477-7774 to inform the sender of the error; and (3) destroy all copies of the original message, including ones on your computer system and all drives.

In accordance with Internal Revenue Service Circular 230, we advise you that if this e-mail contains any tax advice, such tax advice was not intended or written to be used, and it cannot be used by any taxpayer for the purpose of avoiding penalties that may be imposed on the taxpayer.

From: Jason Fowler
Sent: Tuesday, February 18, 2025 11:47 AM
To: Tonya Baltazar <Tonya@mossberglv.com>; Vicki Perez <vperez@ranallilawyers.com>; Celeste Palafox <cpalafox@ranallilawyers.com>; Mikayla Fritchley <mfritchley@ranallilawyers.com>
Cc: Marcus Berg <Marcus@mossberglv.com>; John Funk <John@mossberglv.com>
Subject: RE: Activity in Case 2:25-cv-00146-MMD-MDC Castillo Agurcia v. Walgreen Co. Minute Order Removal Case

Ok, I will get it to you shortly.

Jason

Jason Andrew Fowler, Esq.
Managing Partner
Ranalli Zaniel Fowler & Moran, LLC